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Attorneys for Defendant
SCOTT SHAW

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT SHAW,

Defendant.

No. CR 22-00105-BLF

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE RE:
TRAVEL; [PROPOSED] ORDER**

Defendant Scott Shaw (“Shaw”), by and through his counsel Sam J. Polverino and Jeremy D. Blank, and the Government, represented by AUSA Michael Pitman, hereby stipulate and respectfully request that the Court modify Mr. Shaw’s

1 conditions of pretrial release to allow him to traverse the Eastern District of
2 California en route to the Northern District of California for meetings with his
3 counsel and for appearances before this Court.

4 Mr. Shaw resides in Chimacum, Washington, a distance of almost 900 miles
5 from this Court's chambers. Chimacum is the town where Mr. Shaw grew up, and
6 he is currently living in an RV on the farm where he grew up. He intends to drive
7 that RV from his home in Washington to the Northern District for upcoming court
8 appearances and for meetings with his counsel. However, in order for him to drive
9 from his home District (the Western District of Washington) to this District via
10 Interstate 5 (far and away the most efficient route), he would necessarily transit the
11 Eastern District of California, which this Court's conditions of release preclude him
12 from entering. Accordingly, the parties make the instant request.

13 Mr. Shaw is not currently being supervised by Pretrial Services; as such, that
14 office has not been consulted regarding the instant request.

15 IT IS SO STIPULATED.

16 Dated: August 17, 2022

s/ Sam J. Polverino

Sam J. Polverino

17 Dated: August 17, 2022

s/ Jeremy D. Blank

Jeremy D. Blank

Attorneys for Defendant

Scott Shaw

18 Dated: August 17, 2022

s/ Michael Pitman

Michael Pitman

Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE APPEARING, upon the parties' stipulation, IT IS HEREBY ORDERED that the defendant's pretrial release conditions are modified to permit the defendant to transit the Eastern District of California en route to meetings with his counsel and appearances before this Court.

All other conditions to remain in full effect.

IT IS SO ORDERED.

Dated: August _____, 2022

Hon. Nathanael Cousins
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on August 17, 2022. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system

I certify under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2022.

s/ Jeremy D. Blank
Jeremy D. Blank